

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2021-93-E**

In re:

Dominion Energy South Carolina,  
Incorporated's Request for Like Facility  
Determinations Pursuant to S.C. Code  
Ann. §58-33-110(1) and Waiver of  
Certain Requirements of Commission  
Order No. 2007-626

**PETITION TO INTERVENE**

Pursuant to R.103-825 of the South Carolina Code of Regulations, Sierra Club hereby petitions to intervene in the above-captioned docket. In support of this petition, Sierra Club states as follows:

1. On March 10, 2021, Dominion Energy South Carolina, Inc. ("DESC" or the "Company") filed its Request for "Like Facility" Determinations Pursuant to S.C. Code Ann. § 58-33-110(1) and Waiver of Certain Requirements of Commission Order No. 2007-626 ("CT Plan") with the Public Service Commission of South Carolina ("Commission"). The CT Plan seeks to replace ten existing combustion turbines at its Bushy Park, Parr, and Urquhart sites, and replace them with five new Aeroderivative combustion turbines. The CT Plan also proposes, if its request is granted, modeling the new replacement generation units in its 2021 Integrated Resource Plan ("IRP") Update. Petitioner has intervened and is actively participating in DESC's 2020 IRP (Docket No. 2019-226-E), having just submitted Joint Comments on DESC's Modified 2020 IRP.

2. The Commission has not yet issued a scheduling order in this case or a deadline for parties to file a Notice of Intervention.

3. Sierra Club is a nonprofit conservation organization incorporated in California. It currently represents almost 800,000 dues-paying members nationwide and approximately 6,920 dues-paying members in South Carolina. The Club's mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club and the Sierra Club's South Carolina Chapter works to accelerate the transition from fossil fuels to clean energy solutions and advocates for state and federal policies and industry action to achieve this transition. Sierra Club has a long history of working to reduce pollution from coal-fired power plants and promoting clean energy sources in the Southeast.

4. The Club has participated as intervenors in multiple proceedings before the Commission, including, most recently, Docket Nos. 2020-125-E, 2019-226-E, 2018-322-E, 2018-321-E, 2018-319-E, 2018-318-E, 2017-370-E, 2017-305-E, 2017-207-E, 2016-223-E, 2015-103-E, 2015-55-E, 2015-54-E, and 2015-53-E.

5. Sierra Club and its more than 6,920 members who live in South Carolina—approximately half of which are Dominion customers—have a direct and substantial interest in this proceeding. The Company is seeking to swap out ten combustion turbine generation units for five new ones without going through the siting process or the Commission-mandated Request for Proposal process for new peaking generation units. The Company's request implicates Sierra Club's organizational mission and interests by failing to consider clean energy alternatives.

Moreover, Sierra Club's members who receive electricity service in their homes and businesses from the Company will be affected by the decisions of the Commission in this and future related proceedings.

6. Sierra Club and its members have an interest in ensuring that replacement of current generation units that are approved by the Commission advance the important objectives of promoting cost-saving clean energy, energy efficiencies, and distributed generation, and avoid disproportionate and unreasonable burdens on low-income South Carolinians. No other party will adequately represent Sierra Club's interests in this case.

7. Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding the Company's CT Plan. Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public's interest.

8. The address of the Sierra Club's principal office in South Carolina is 1314 Lincoln Street, Columbia, South Carolina 29201.

9. Pursuant to R.103-804(T) and R.103-805 of the South Carolina Code of Regulations, counsel representing Sierra Club in this proceeding is:

Robert Guild  
314 Pall Mall Street  
Columbia, SC 29201  
Tel: (803) 917-5738  
Email: [bguild@mindspring.com](mailto:bguild@mindspring.com)


10. Sierra Club consents to service via electronic mail and requests that all communications regarding this docket should be directed to Sierra Club's counsel of record at:

Dori Jaffe (*Pro Hac Vice Motion pending*)  
50 F St NW, 8<sup>th</sup> Floor  
Washington, DC 20001  
Tel: (202) 675-6275

Email: [dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

WHEREFORE, Petitioners request that they be allowed to intervene as a party of record in this proceeding.

Respectfully submitted this 12th day of May, 2021.

 On behalf of \_\_\_\_\_  
Robert Guild  
S.C. Bar No. 2358  
314 Pall Mall Street  
Columbia, SC 29201  
(803) 917-5738  
[bguild@mindspring.com](mailto:bguild@mindspring.com)

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2021-93-E**

In re:

Dominion Energy South Carolina,  
Incorporated's Request for Like Facility  
Determinations Pursuant to S.C. Code  
ann. §58-33-110(1) and Waiver of  
Certain Requirements of Commission  
Order No. 2007-626

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2021-93-E, listed below, a copy of the Petition to Intervene of Sierra Club via electronic mail on this 12th day of May, 2021.

Alexander W. Knowles,  
aknowles@ors.sc.gov

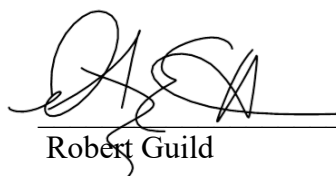
Andrew M. Bateman,  
abateman@ors.sc.gov

Carri Grube Lybarker,  
clybarker@scconsumer.gov

Roger P. Hall,  
rhall@scconsumer.gov

Matthew W. Gissendanner,  
matthew.gissendanner@dominionenergy.com

Kate Lee Mixson,  
kmixson@selcsc.org

 On behalf of  
Robert Guild